

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FOX VALLEY & VICINITY CONSTRUCTION)	
WORKERS WELFARE FUND, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 18 C 5314
)	
R & W CLARK CONSTRUCTION, INC.,)	JUDGE VIRGINIA M. KENDALL
an Illinois corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF JUDGMENT

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on October 9, 2018, request this Court enter judgment against Defendant, R & W CLARK CONSTRUCTION, INC., an Illinois corporation. In support of this Motion, Plaintiffs state:

1. On October 9, 2018, this Court entered default against Defendant and granted Plaintiffs' request for an order directing an audit of the Defendant's payroll books and records. The Court also entered an order that judgment would be entered after the completion of the audit.

2. On January 24, 2019, Plaintiffs' auditors conducted the audit. The audit findings show that the Defendant is delinquent in contributions to the Funds in the amount of \$7,666.32. (See Affidavit of David A. Dorfman).

3. Additionally, the amount of \$766.63 is due for liquidated damages and \$1,000.91 is due for interest. (Dorfman Aff. Par. 6). Plaintiffs' auditing firm of Calibre CPA Group, PLLC charged Plaintiffs \$2,081.94 to perform the audit examination and complete the report (Dorfman Aff. Par. 7).

4. In addition, Plaintiffs' firm has expended \$532.00 for costs and \$2,553.75 for attorneys' fees in this matter. (See Affidavit of Catherine M. Chapman).

5. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$14,601.55.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$14,601.55.

/s/ Cecilia M. Scanlon

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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that on or before the hour of 5:00 p.m., this 27th day of March 2019, she electronically filed the foregoing document (Motion for Entry of Judgment) with the Clerk of Court using the CM/ECF system, which will send notice to the following:

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